

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Robert L. Talkington, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a West Virginia State Trooper with the rank of Sergeant assigned to the Crimes Against Children Unit and a member of the West Virginia Internet Crimes Against Children Task Force. I have been employed with the West Virginia State Police since May, 1995. As part of my daily duties as a West Virginia Internet Crimes Against Children Task Force, I investigate criminal violations relating to child exploitation and child pornography including violations pertaining to the illegal production, distribution, receipt, and possession of child pornography, in violation of 18 U.S.C. §§ 2252(a) and 2252A, and interstate travel with the intent to engage in illicit sexual conduct, in violation of 18 U.S.C. § 2423(b). I have received training in the area of child pornography and child exploitation, and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media. I have also participated in the execution of approximately 50 search warrants, many of which involved child exploitation and/or child pornography offenses.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

3. In March 2012, I began to investigate a Priority 1 Cyber Tip from NCMEC (National Center for Missing and Exploited Children). This Cyber Tip alleged two (2) children from Gilmer County, West Virginia were immediate danger.

4. When reviewing this CyberTip and attachments, I learned that the two (2) children were a 15 year-old female and her younger brother. The complainant alleged that a person calling himself/herself "Puryear Wilson" had threatened the life of the 15 year-old female, hereafter referred to as C.T.

5. The complainant alleged "Puryear Wilson" had threatened C.T. because C.T. had told "Puryear Wilson's" 15 year-old girlfriend, A.L., C.T. did not believe "Puryear Wilson" was who "he" said "he" was.

6. The victim, A.L., was interviewed by me on March 26, 2012, and was interviewed again on May 8, 2012. On the basis of these interviews and my investigation, as set forth below, I believe "Puryear Wilson" to be Carissa Hads.

#### **PROBABLE CAUSE**

7. During my investigation, I learned:

- a. A.L. met "James Puryear Wilson" on the Internet on a social networking site in or about October, 2010;
- b. A.L. and "Puryear Wilson" communicated regularly and became involved in an internet romance;

- c. According to statements from A.L. and her mother, when A.L. and "Wilson" began communicating on the Internet, "Wilson" told A.L. that "he" was a 17 year-old male;
- d. "Wilson" sent A.L. a cellular telephone for A.L.'s use to contact "him", and "Wilson" paid for the cellular telephone and the monthly bill for the cellular telephone, which later was identified as an LG cellular telephone, Model LN 510. The LG cellular telephone was the subject of a separate request for a search warrant.
- e. "Wilson" told A.L. that "he" was the father of twin sons, and posted a picture of twin boys on a social networking home page;
- f. An associate of A.L., who also had access to this picture, learned it actually came from the homepage of an internet advertisement for a photography company located in North Carolina;
- g. Upon learning this information, A.L.'s mother contacted the North Carolina photographer by telephone and learned the picture was actually of the photographer's twin sons;
- h. When confronted about the fact that the picture on "Wilson's" social networking home page was not of "his" twin boys, "Wilson" advised "he" did not want to put a picture of "his" children on the internet because "he" did not want someone to steal and use such a picture;

- i. "Wilson" told A.L. and A.L.'s mother that "he" lived in Massachusetts with "his" aunt, Melaine Lodi, and that "he" also has an aunt named Carissa Hads;
- j. "Wilson" bought a second cellular telephone, a T Mobile My Touch 4G Slide, and forwarded it to A.L. "Wilson" also paid the monthly bill for that cellular telephone, letting the service expire on the previously provided cellular telephone;
- k. "Wilson" also bought a Kindle tablet computer, and forwarded it to A.L.'s mother;
- l. A.L. used the LG cellular telephone and the T Mobile My Touch 4G Slide cellular telephone and the Kindle table computer to communicate with "Wilson";
- m. In December 2011, after "Wilson" and A.L. had been communicating for 14 months, "Wilson" wanted to meet A.L., so A.L. and A.L.'s mother traveled from their residence in Linn, Lewis County, West Virginia (just across the line from Gilmer County, West Virginia) to Coraopolis, Pennsylvania;
- n. A.L.'s mother paid for a motel room, where she, A.L., and two (2) other 15 year-old female children stayed. "Wilson", who claimed to have flown from Massachusetts to the nearby Pittsburgh International Airport, stayed in the same motel in a separate room paid for by A.L.'s mother;
- o. A.L. stated that, during the evening hours of December 10, 2011, "Wilson" digitally penetrated A.L.'s vagina;

- p. A.L.'s mother advised that, in February 2012, "Wilson" flew into Benedum Airport (also known as Harrison-Marion Regional Airport) in Bridgeport, West Virginia, then A.L.'s mother transported "Wilson" to A.L.'s residence in Lewis County, West Virginia. "Wilson" stayed at this residence from February 23, 2012 through February 28, 2012;
- q. A.L.'s mother advised that A.L. stated she and "Wilson" engaged in sexual intercourse during "Wilson's" stay at the residence, but that "Wilson" did not get undressed. A.L. confirmed this during her May 8, 2012 interview;
- r. A.L. and A.L.'s mother stated they have never seen "Wilson" naked or partially naked, and that "Wilson" appeared to have brown eyes, but wore blue colored contact lenses and wore a back brace which covered "his" chest;
- s. A.L. has admitted that she took naked pictures of herself on the LG cellular telephone and the T Mobile My Touch 4G Slide cellular telephone provided to her by "Wilson." A.L. advised that she forwarded these pictures, some of which focused on her vagina, to "Wilson" via the phones' text messaging features;
- t. On Monday, March 26, 2012, at "Wilson's" request, A.L.'s mother packaged various items that "Wilson" previously had purchased for A.L. into two (2) boxes, which she sent via United States Mail to "Puryear Wilson, 189 Whitwell Street, # 3, Quincy, MA 02169";

- u. On Thursday, March 29, 2012, these packages were intercepted by Inspector Ryan Amstone of the United States Postal Service, and A.L.'s mother completed a written consent form authorizing my search of these packages;
- v. When I searched these packages on the same date, I located several items of clothing, toys, notebooks/journals, a Kindle model DO1200 tablet computer with unknown serial number, multiple mailings addressed to A.L. at PO Box 103, Linn, WV 26384 from Puryear Wilson of 189 Whitwell St, Quincy, MA 02169 and a black T Mobile My Touch 4G Slide cellular telephone, bearing serial number HT18NTB0026, which contained an 8 GB micro SD card;
- w. I learned A.L. and "Wilson" would write in the notebooks/journals and mail them back and forth to each other so each could respond to the other's writings;
- x. "Wilson" provided the Quincy, Massachusetts address to A.L., and A.L. has used it successfully to mail items to "Wilson" throughout their relationship.

8. I searched databases available to law enforcement, including those for driver's license, criminal history and other personal information maintained by non-governmental agencies and made available to law enforcement, and can find no record of "James Puryear Wilson" or "Puryear Wilson".

9. Although "Wilson" advised A.L. that Carissa Hads was "his" aunt who lived in another State, these same databases show Carissa Hads' address as 189 Whitwell Street, # 3, Quincy, MA 02169 and reflect that she is a 24 year-old female.

10. I have reviewed the MySpace and Facebook pages of "Wilson" (Puryear AlwaysPraying Wilson on Facebook, and Puryear [Twin\$] on MySpace), and Carissa Hads (Carissa [Shorty] on MySpace, and Carissa Hads on Facebook), and I believe there is a high probability "Wilson" and Hads are the same person.

- a. "Wilson" has no evident Adam's apple and has very feminine facial features;
- b. Carissa Hads has brown eyes;
- c. "Wilson" and Hads are the same general size and share the same hair color, body shape, and characteristics;
- d. Attachment ~~X~~<sup>A</sup> is a compilation of photographs of "Wilson" and Hads, obtained from social media networking sites (MySpace and Facebook pages) for "Wilson", Hads, and A.L.

11. Passenger information regarding flights to and from the Harrison-Marion Regional Airport during February 2012 confirms that Carissa Hads, and not "James Puryear Wilson" or "Puryear Wilson" flew into and out of Bridgeport, West Virginia.

12. A Bank of America VISA credit card ending in 2256 with an expiration date of 05/31/15 and issued in the name of Carissa Hads was used to purchase from Cheapoair.com the December 2011 and February 2012 airline tickets to Pittsburgh and Bridgeport, respectively.

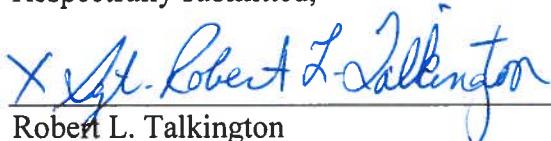
13. During "Wilson's" February 2012 stay at A.L.'s residence in Lewis County, West Virginia, the same VISA credit card was used during a purchase at the Glenville Pizza Hut.

14. As recently as April 4, 2012, "Wilson" has expressed to A.L.'s mother an interest in flying back to West Virginia to visit A.L.

15. According to A.L.'s mother Wilson plans to fly from the State of Massachusetts to Pittsburgh, Pennsylvania on or about May 24, 2012, and "Wilson" has requested that A.L. and her mother travel there to meet "him."

16. According to United Airlines information, Carissa Hads has purchased an airline ticket to fly between Massachusetts and Pittsburgh, Pennsylvania, leaving on May 24, 2012 and returning on May 27, 2012.

Respectfully submitted,

  
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Robert L. Talkington

Robert L. Talkington  
West Virginia State Police  
Internet Crimes Against Children Task Force

Subscribed and sworn to before me on this 22 day of May 2012.

  
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JOHN S. KAULL  
UNITED STATES MAGISTRATE JUDGE